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REMARKS

This is in response to the Office action mailed October 21, 2005.

Claims 22 through 31 have been canceled, and claim 1 has been amended to include the limitations of claim 22. No new matter has been added.

Claims 22-27 have been rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 2,635,491 to Bell et al. Claims 22-27 have been cancelled. Accordingly, the rejection is moot.

Claims 1-21 and 28-31 have been rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 3,910,738 to Chandler et al. in view of U.S. Patent No. 250,946 to Morin. Applicant respectfully traverses the rejection on the grounds that Ghandler et al. and Morin fail to teach or suggest each and every element of the claimed invention as required under §103(a). Accordingly, withdrawal of the rejection is respectfully requested.

Applicant has canceled claims 28-31 and amended claim 1, from which claims 2-21 depend. In particular, applicant has amended claim 1 to include the limitations of canceled claim 22. Thus, claim 1 has been amended to require, among other things, grasping a first handle with a hand and grasping a second handle with another hand, contacting a knurled member with a surface of a plate and manually rolling the knurled member about the surface of the plate. Applicant respectfully submits that neither Chandler et al. nor Morin teaches or suggests providing a tool including a rod having a length, a first handle connected with the rod, as second handle connected with the rod, and a knurled member 5

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connected with the rod, wherein the second handle extends toward the knurled member, away from the first handle and beyond the length of the rod, grasping the first handle with a hand and grasping the second handle with another hand, contacting the knurled member with a surface of the plate, and manually rolling the knurled member about the surface of the plate. Accordingly, withdrawal of the §103(a) rejection is respectfully requested.

Reconsideration and allowance of the claims are respectfully requested

Respectfully submitted,
SIROTE & PERMUTT, P.C.

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C. Brandon Browning Reg. No. 44,570 205-930-5141

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